

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**TQP DEVELOPMENT, LLC,**

Plaintiff,

v.

**WELLS FARGO BANK, N.A.,**

Defendant.

**Civil Action No. 2:12-cv-61-JRG-RSP**

**CONSOLIDATED**

**JURY TRIAL DEMANDED**

**TQP DEVELOPMENT, LLC,**

Plaintiff,

v.

**SECURITY SERVICE FEDERAL  
CREDIT UNION,**

Defendant.

**Civil Action No. 2:12-cv-72-JRG-RSP**

**JURY TRIAL DEMANDED**

**STIPULATED MOTION FOR DISMISSAL WITH PREJUDICE**

The plaintiff TQP Development, LLC and defendant Security Services Federal Credit Union, pursuant to Fed. R. Civ. P. 41(a)(2) and (c), hereby move for an order dismissing the complaint and all claims and counterclaims pending between them in *TQP Development, LLC v. Security Service Federal Credit Union, et al.*, Case No. 2:12-cv-72, **WITH PREJUDICE**, subject to the terms of that certain agreement entitled “**AGREEMENT**” and dated February 26, 2013, with each party to bear its own costs, expenses and attorneys’ fees.

SO STIPULATED:

Dated February 27, 2013.

Respectfully submitted,

/s/ Phong D. Nguyen

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**Attorneys for Plaintiff  
TQP DEVELOPMENT, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of February, 2013, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Adam S. Hoffman  
Adam S. Hoffman

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Plaintiff and Defendant have conferred regarding the foregoing Motion, and Defendant does not oppose the relief sought.

Dated: February 27, 2013

/s/ Adam S. Hoffman  
Adam S. Hoffman